

EXHIBIT C

**SUBSEQUENT TRANSFERS SOUGHT BY THE
TRUSTEE FROM THE BARCLAYS DEFENDANTS BASED
ON ALLEGED INITIAL TRANSFERS MADE (i) PRIOR TO
AND (ii) WITHIN THE TWO-YEAR LOOKBACK PERIOD
APPLICABLE TO AVOIDANCE CLAIMS UNDER
BANKRUPTCY CODE SECTION 548(a)(1)(A)¹**

¹ The Trustee's claims to recover alleged subsequent transfers based on initial transfers that are not avoidable under Section 548(a)(1)(A) are subject to dismissal under Section 546(e) of the Bankruptcy Code. Avoidance under Section 548(a)(1)(A) is available only with respect to initial transfers made within two years before the date of the filing of the BLMIS liquidation petition. The Complaint describes the two-year lookback period as extending to the initial transfers made by BLMIS to Fairfield Sentry during the period of December 11, 2006 through December 11, 2008. However, the Trustee has pleaded that the first initial transfer from BLMIS to Fairfield Sentry within that period was allegedly made on September 5, 2007. As a result, only the alleged subsequent transfers made by Fairfield Sentry and Fairfield Sigma to the Barclays Defendants on or after September 5, 2007 could potentially survive dismissal under Section 546(e). The charts in this exhibit have been created accordingly.

Chart C.1²

**Subsequent Transfers Sought from Caixabank S.A.
Based on Initial Transfers Made Prior to the Two-Year Lookback
Period Applicable to Avoidance Claims Under Section 548(a)(1)(A)**

<u>Date</u>	<u>Transferor</u>	<u>Amount</u>
8/26/2003	Fairfield Sigma	\$33,045
11/19/2003	Fairfield Sentry	\$301,681
11/24/2003	Fairfield Sigma	\$970,173
1/26/2004	Fairfield Sigma	\$191,834
3/29/2004	Fairfield Sigma	\$31,272
3/29/2004	Fairfield Sigma	\$3,687,157
5/17/2004	Fairfield Sentry	\$146,471
9/27/2004	Fairfield Sigma	\$853,293
12/22/2004	Fairfield Sigma	\$35,328
5/19/2005	Fairfield Sigma	\$16,787
7/15/2005	Fairfield Sentry	\$2,685,870
8/12/2005	Fairfield Sigma	\$17,912
8/12/2005	Fairfield Sigma	\$31,843
8/12/2005	Fairfield Sigma	\$183,205
10/14/2005	Fairfield Sentry	\$95,898
11/23/2005	Fairfield Sigma	\$218,188
11/23/2005	Fairfield Sigma	\$315,096
11/23/2005	Fairfield Sigma	\$395,656
11/23/2005	Fairfield Sigma	\$443,741
12/21/2005	Fairfield Sigma	\$6,312

² The information set out in these charts has been gleaned from exhibits to the Complaint (ECF No. 1), as amended by subsequent stipulation, in adversary proceeding No. 11-02569. In accordance with the stipulation entered on February 14, 2022 (ECF No. 122), the following subsequent transfers alleged in the Complaint have not been included in these charts because the Trustee has withdrawn his claim as to those transfers and the Court in turn has dismissed them: (i) \$203,462 on January 20, 2003 (Compl. Ex. F); (ii) \$1,469,096 on January 20, 2003 (Compl. Ex. F); (iii) \$987,933 on April 25, 2003 (Compl. Ex. F); and (iv) \$73,352 on April 14, 2003 (Compl. Ex. I).

<u>Date</u>	<u>Transferor</u>	<u>Amount</u>
12/21/2005	Fairfield Sigma	\$89,820
12/21/2005	Fairfield Sigma	\$346,396
1/27/2006	Fairfield Sigma	\$32,488
1/27/2006	Fairfield Sigma	\$162,001
1/27/2006	Fairfield Sigma	\$219,213
2/15/2006	Fairfield Sentry	\$225,673
2/15/2006	Fairfield Sigma	\$264,255
4/20/2006	Fairfield Sentry	\$56,931
4/20/2006	Fairfield Sentry	\$56,931
4/20/2006	Fairfield Sentry	\$56,942
5/24/2006	Fairfield Sigma	\$545,505
6/20/2006	Fairfield Sigma	\$1,359,131
8/14/2006	Fairfield Sigma	\$354,463
11/14/2006	Fairfield Sentry	\$1,018,648
11/17/2006	Fairfield Sigma	\$833,708
12/15/2006	Fairfield Sentry	\$74,208
12/18/2006	Fairfield Sigma	\$161,843
12/18/2006	Fairfield Sigma	\$417,217
4/17/2007	Fairfield Sigma	\$109,652
4/17/2007	Fairfield Sigma	\$423,149
6/19/2007	Fairfield Sigma	\$18,135
7/19/2007	Fairfield Sigma	\$34,934
<u>TOTAL</u>		<u>\$17,522,005</u>

Chart C.2

**Subsequent Transfers Sought from Caixabank S.A.
Based on Initial Transfers Made Within the Two-Year Lookback
Period Applicable to Avoidance Claims Under Section 548(a)(1)(A)**

<u>Date</u>	<u>Transferor</u>	<u>Amount</u>
9/20/2007	Fairfield Sigma	\$18,236
12/18/2007	Fairfield Sigma	\$36,782
1/24/2008	Fairfield Sigma	\$19,492
3/18/2008	Fairfield Sigma	\$528,136
6/18/2008	Fairfield Sigma	\$39,609
<u>TOTAL</u>		<u>\$642,255</u>

Chart C.3

**Subsequent Transfers Sought from Barclays Bank (Suisse) S.A.
 Based on Initial Transfers Made Prior to the Two-Year Lookback
 Period Applicable to Avoidance Claims Under Section 548(a)(1)(A)**

<u>Date</u>	<u>Transferor</u>	<u>Amount</u>
8/15/2003	Fairfield Sentry	\$26,317
10/14/2003	Fairfield Sentry	\$268,887
3/18/2004	Fairfield Sentry	\$49,529
5/17/2004	Fairfield Sentry	\$107,412
8/13/2004	Fairfield Sentry	\$564,757
9/15/2004	Fairfield Sentry	\$519,454
8/12/2005	Fairfield Sigma	\$134,135
9/15/2005	Fairfield Sentry	\$370,806
10/14/2005	Fairfield Sentry	\$258,269
10/14/2005	Fairfield Sentry	\$516,826
11/17/2005	Fairfield Sentry	\$279,110
11/17/2005	Fairfield Sentry	\$337,604
11/17/2005	Fairfield Sentry	\$434,413
11/17/2005	Fairfield Sentry	\$1,026,301
12/19/2005	Fairfield Sentry	\$113,675
12/19/2005	Fairfield Sentry	\$243,030
12/19/2005	Fairfield Sentry	\$357,908
12/19/2005	Fairfield Sentry	\$1,094,186
1/19/2006	Fairfield Sentry	\$63,265
1/19/2006	Fairfield Sentry	\$978,099
1/19/2006	Fairfield Sentry	\$1,046,249
1/19/2006	Fairfield Sentry	\$3,711,590
2/15/2006	Fairfield Sentry	\$110,776
2/15/2006	Fairfield Sentry	\$156,859
2/15/2006	Fairfield Sentry	\$1,334,212
2/15/2006	Fairfield Sigma	\$118,171

<u>Date</u>	<u>Transferor</u>	<u>Amount</u>
3/17/2006	Fairfield Sentry	\$554,969
3/17/2006	Fairfield Sentry	\$289,672
4/20/2006	Fairfield Sentry	\$64,093
4/20/2006	Fairfield Sentry	\$522,002
4/21/2006	Fairfield Sigma	\$385,519
5/15/2006	Fairfield Sentry	\$272,413
5/15/2006	Fairfield Sentry	\$388,381
6/16/2006	Fairfield Sentry	\$57,151
6/16/2006	Fairfield Sentry	\$108,702
6/16/2006	Fairfield Sentry	\$228,605
6/16/2006	Fairfield Sentry	\$552,082
6/20/2006	Fairfield Sigma	\$107,119
7/20/2006	Fairfield Sentry	\$163,561
8/14/2006	Fairfield Sentry	\$193,411
9/14/2006	Fairfield Sentry	\$133,871
9/14/2006	Fairfield Sentry	\$386,954
10/16/2006	Fairfield Sentry	\$112,882
12/15/2006	Fairfield Sentry	\$115,308
12/28/2006	Fairfield Sentry	\$70,366
2/15/2007	Fairfield Sentry	\$115,639
3/16/2007	Fairfield Sentry	\$101,021
6/15/2007	Fairfield Sentry	\$56,183
6/19/2007	Fairfield Sigma	\$366,500
8/17/2007	Fairfield Sentry	\$658,019
<u>TOTAL</u>		<u>\$20,226,263</u>

Chart C.4

**Subsequent Transfers Sought from Barclays Bank (Suisse) S.A.
 Based on Initial Transfers Made Within the Two-Year Lookback
 Period Applicable to Avoidance Claims Under Section 548(a)(1)(A)**

<u>Date</u>	<u>Transferor</u>	<u>Amount</u>
9/19/2007	Fairfield Sentry	\$168,743
9/19/2007	Fairfield Sentry	\$296,985
9/20/2007	Fairfield Sigma	\$79,587
10/16/2007	Fairfield Sentry	\$932,698
10/19/2007	Fairfield Sigma	\$2,252,340
11/19/2007	Fairfield Sentry	\$211,804
11/19/2007	Fairfield Sentry	\$366,687
12/19/2007	Fairfield Sentry	\$1,337,022
1/17/2008	Fairfield Sentry	\$293,571
1/17/2008	Fairfield Sentry	\$449,597
2/15/2008	Fairfield Sentry	\$103,862
3/18/2008	Fairfield Sentry	\$231,858
4/14/2008	Fairfield Sentry	\$526,624
4/14/2008	Fairfield Sentry	\$651,033
5/15/2008	Fairfield Sentry	\$266,021
5/15/2008	Fairfield Sentry	\$280,434
5/15/2008	Fairfield Sentry	\$6,837,053
6/17/2008	Fairfield Sentry	\$89,698
6/18/2008	Fairfield Sigma	\$3,579,591
7/15/2008	Fairfield Sentry	\$52,997
7/15/2008	Fairfield Sentry	\$122,092
8/18/2008	Fairfield Sentry	\$91,325
10/15/2008	Fairfield Sentry	\$112,249
10/15/2008	Fairfield Sentry	\$235,545
10/15/2008	Fairfield Sentry	\$292,221
11/19/2008	Fairfield Sentry	\$30,734

<u>Date</u>	<u>Transferor</u>	<u>Amount</u>
11/19/2008	Fairfield Sentry	\$214,055
11/19/2008	Fairfield Sentry	\$230,731
11/19/2008	Fairfield Sentry	\$357,646
11/19/2008	Fairfield Sentry	\$415,813
11/19/2008	Fairfield Sentry	\$1,260,873
11/19/2008	Fairfield Sentry	\$2,398,382
11/21/2008	Fairfield Sigma	\$133,384
11/21/2008	Fairfield Sigma	\$256,854
11/21/2008	Fairfield Sigma	\$291,553
<u>TOTAL</u>		<u>\$25,451,662</u>

Chart C.5

**Subsequent Transfers Sought from Zedra Trust Company (Jersey) Limited
Based on Initial Transfers Made Within the Two-Year Lookback
Period Applicable to Avoidance Claims Under Section 548(a)(1)(A)**

<u>Date</u>	<u>Transferor</u>	<u>Amount</u>
7/15/2008	Fairfield Sentry	\$820,636
<u>TOTAL</u>		<u>\$820,636</u>

Chart C.6

Summary of Subsequent Transfers Sought by Trustee Based on Initial Transfers Made (i) Prior to and (ii) Within the Two-Year Lookback Period Applicable to Avoidance Claims Under Section 548(a)(1)(A)

	Total Amount of Subsequent Transfers Sought by Trustee Based on Initial Transfers Made Prior to the Two-Year Lookback Period (and Number of Transfers)	Total Amount of Subsequent Transfers Sought by Trustee Based on Initial Transfers Made Within the Two-Year Lookback Period (and Number of Transfers)	Total Amount of Subsequent Transfers Sought by Trustee (and Number of Transfers)
From Caixabank S.A.	\$17,522,005 (42) ³	\$642,255 (5) ⁴	\$18,164,260 (47) ⁵
From Barclays Bank (Suisse) S.A.	\$20,226,263 (50) ⁶	\$25,451,662 (35) ⁷	\$45,677,925 (85) ⁸
From Zedra Trust Co. (Jersey) Limited	None	\$820,636 (1) ⁹	\$820,636 (1) ¹⁰
<u>TOTAL</u>	\$37,748,268 (92)¹¹	\$26,914,553 (41)¹²	\$64,662,821 (133)¹³

³ \$4,719,253 (10 transfers) from Fairfield Sentry; \$12,802,752 (32 transfers) from Fairfield Sigma.

⁴ All from Fairfield Sigma.

⁵ \$4,719,253 (10 transfers) from Fairfield Sentry; \$13,445,007 (37 transfers) from Fairfield Sigma.

⁶ \$19,114,819 (45 transfers) from Fairfield Sentry; \$1,111,444 (5 transfers) from Fairfield Sigma.

⁷ \$18,858,353 (29 transfers) from Fairfield Sentry; \$6,593,309 (6 transfers) from Fairfield Sigma.

⁸ \$37,973,172 (74 transfers) from Fairfield Sentry; \$7,704,753 (11 transfers) from Fairfield Sigma.

⁹ All from Fairfield Sentry.

¹⁰ All from Fairfield Sentry.

¹¹ \$23,834,072 (55 transfers) from Fairfield Sentry; \$13,914,196 (37 transfers) from Fairfield Sigma.

¹² \$19,678,989 (30 transfers) from Fairfield Sentry; \$7,235,564 (11 transfers) from Fairfield Sigma.

¹³ \$43,513,061 (85 transfers) from Fairfield Sentry; \$21,148,760 (48 transfers) from Fairfield Sigma.